

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

NOTICE OF MOTION

-against-

12 Cr. 661 (SLT)

ALI YASIN AHMED,

Defendant.

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PLEASE TAKE NOTICE that the defendant, ALI YASIN AHMED, will move this Court before the Honorable Sandra L. Townes, United States District Judge, Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY, at a time that is convenient for the Court, for an Order granting the following relief:

- (1) For an Order Pursuant to Rule 12(b)(3)(c) of the Federal Rules of Criminal Procedure suppressing statement evidence and the fruits of such statements, on the grounds that such statements: (a) were involuntary, the product of torture, and taken in violation of 18 U.S.C § 3501(a), *Oregon v. Elstad*, 470 U.S. 298 (1985) and *Miranda v. Arizona*, 384 U.S. 436 (1966); (b) were obtained in violation of Federal Rule of Criminal Procedure 5(a)(1)(B) and 18 U.S.C. § 3501(c); and (c) were obtained in violation of Part I, Article 15 of the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (June 26, 1987), to which the United States is a signatory; or in the alternative ordering a pre-trial evidentiary hearing;
- (2) For an Order permitting Mr. Ahmed to join any and all motions and supporting memoranda filed by co-defendants that are applicable to Mr. Ahmed;
- (3) For an Order permitting ALI YASIN AHMED to make such other and further motions as may

be appropriate; and

(4) For such other and further relief as this Court deems just and proper.

Dated: September 18, 2014
Brooklyn, New York

Yours, etc.

A handwritten signature in black ink, appearing to read "S.G. Kellman", followed by a long horizontal line.

SUSAN G. KELLMAN, Esq.
SARAH KUNSTLER, Esq.
EZRA SPILKE, Esq.
Counsel for
ALI YASIN AHMED
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TO: CLERK OF THE COURT
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

HON. SANDRA L. TOWNES
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

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